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March 23, 2020

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Jun v. Central Park West Studio, PLLC, et al. 19-cv-11716 (LGS);
Second request to adjourn initial conference

Dear Judge Schofield:

I represent plaintiff Eunice Jun in the above-referenced case, and I am writing in response to the Court's Order dated March 20, 2020 (Dkt. No. 14).

Due to the national emergency, and specifically to the fact that my 3-year old child is no longer attending school and instead requires full-time attention at home by myself and my spouse (who is also working full-time), my ability to get work done has been hampered. I apologize to for not filing the case management plan and joint letter, or at least an update to the Court, by March 19, 2020. I mean no disrespect to this Court; these circumstances are outside of my control.

With respect to the issue of service on the defendants, the process server I hired has indicated that defendant Nuance Dental Studio, PLLC was served on March 13, 2020, and defendants Central Park West Studio, PLLC and Genevieve Fernandes were served on February 28, 2020. I have not filed the affidavits of service because I am having trouble locating them, and due to the closure of businesses in New York, it may take some time to get replacements if I cannot find the originals.

The defendants have not yet, as far as I know, engaged counsel to represent them. I have been in contact with Daniel Rudick, the office manager for Central Park West Dental Studio. Both he and the individual defendant, Dr. Genevieve Fernandes, participated, without counsel, at the telephonic mediation which was held on March 16, 2019. Settlement discussions are ongoing.

By email I have transmitted the Court's Order dated March 20, 2020 (Dkt. No. 14) to Mr. Rudick and to Dr. Fernandes.

I do not believe it will be possible to submit a joint case management plan to this Court by noon today. Because the defendants are currently unrepresented, even if a joint plan were

Honorable Lorna G. Schofield

March 23, 2020

p. 2

submitted in the near future, it would likely be subject to review if and when the defendants retain an attorney.

In light of the mediation that was held, the ongoing settlement discussions, the fact that defendants were served less than a month ago, have not yet answered and have not yet appeared by counsel, I respectfully request that the Court adjourn the initial conference, currently scheduled for March 26, 2020, until May 28, 2020, with the initial case management plan to be filed a week prior thereto.

Thank you for your consideration.

Very truly yours,

/s/

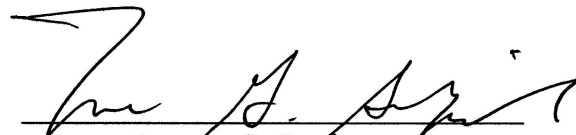
Adam Braverman

The initial pretrial conference, scheduled for March 26, 2020, is ADJOURNED to April 23, 2020, at 10:40 a.m. By April 16, 2020, the parties shall submit either (1) the joint letter and proposed case management plan; or (2) a status letter explaining why they are not able to do so.

Plaintiff shall file the affidavits of service as soon as possible, and in any event no later than April 16, 2020. If Defendants have not filed an answer, move or otherwise respond to the Complaint by that date, Plaintiff shall move for default pursuant to Attachment A of this Court's Individual Rules.

So Ordered.

Dated: March 23, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE